

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION

UNITED STATES OF AMERICA)
)
 v.)) No. 2:22-CR-72
)
 TWALA LATRESA LOVE)
 MELVIN SEBASTIAN GRAY)

MOTION TO UNSEAL DOC. 193 AND ENTER A PROTECTION ORDER

COMES NOW the United States of America, by and through the United States Attorney for the Eastern District of Tennessee, and respectfully requests that Document 193, Notice of Objections and its Attachments (1) Exhibit Report, (2) Exhibit Supplement to Report, (3) Exhibit Photo Capture, (4) Exhibit Screen Capture, be unsealed as to defendants Twala Latresa Love and Melvin Sebastian Gray or in the alternative the Court allow the United States to provide the above listed items to the above listed defendants and states the reasons for herein:

Love, Gray and codefendant Jarvis Lamont Carlyle were charged with several counts to include conspiracy to distribute and distribution of fentanyl which resulted in a death, as charged in Counts two and three of this case. On July 9, 2024, Carlyle filed a Notice of Objections to his Presentence Report. As part of his objection, he filed several exhibits of support. After reviewing these documents, the United States believes that they may aide in Love and Gray's defense. Due to this belief the United States via email notified counsel for both defendants on July 15,

2024 about this potential information. The United States has also spoken to counsel for Carlyle who agrees with this motion. Currently Document 193 and its related documents are under seal, as such the United States would ask the Court to unseal Document 193 and its attachment only to counsel for Love and Gray.

Additionally, the United States requests that a Protective Order be issued to guard against dissemination of the confidential information and other sensitive personal data contained in Doc 193 and its attachments as follows:

1. The United States requests an Order directing that before defense counsel disseminates or otherwise discloses to any person, including the attorney's client, Document 193 and its attachments which contain confidential information which is referenced in Federal Rules of Criminal Procedure 49.1, defense counsel shall redact that information from any copies and shall not otherwise disclose that confidential or personal identifying information.
2. The United States recognizes that the attorneys may provide un-redacted copies or otherwise disclose such information to investigators or experts retained by the attorneys. The United States would request the Court's Order instruct the attorneys upon any dissemination of the materials and information containing confidential information to inform the recipient as to the existence of the Protective Order and the requirement to maintain the confidentiality of the information conveyed.

3. The United States further requests that, should the attorneys believe it necessary to furnish un-redacted copies of Document 193 and its attachments to anyone else or to otherwise disclose confidential information or personal identifying information as described in Rule 49.1 to any other person, the attorneys be required to file a motion with the Court requesting permission to do so, only after giving the person to whom that information applies notice of the motion and the date the motion will be presented to the judge.
4. The United States further requests that, the attorneys limit dissemination of the documents to the defendants Twala Latresa Love and Melvin Sebastian Gray and the named defendants are barred from disseminating any of the documents or any of the information therein to anyone else.

WHEREFORE, the United States respectfully requests that the Court unseal Document 193 and its attachments or in the alternative allow the release of these documents to Twala Latresa Love and Melvin Sebastian Gray within the confines of the Protective Order submitted herein.

Respectfully submitted, this the 17th day of July, 2023.

Respectfully submitted,

FRANCIS M. HAMILTON III
United States Attorney

By: *s/ Meghan L. Gomez*
Meghan Lynn Gomez
Assistant United States Attorney
FL Bar#: 068858
220 W. Depot Street, Suite 423
Greeneville, Tennessee 37743
meghan.gomez@usdoj.gov

s/ Thomas McCauley
THOMAS McCAULEY
Assistant United States Attorney
TN BPR# 035250
220 W. Depot Street, Suite 423
Greeneville, Tennessee 37743
(423) 639-6759
Thomas.McCauley@usdoj.gov